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November 12, 2024

Mercy Bankruptcy – Case No. 23-00623

By: Clerk of Court
Deputy 

The purpose of this letter is to express an objection to the “Objection to Administrative Claim and Notice of Objection Bar Date” notice received last week.

I submit an email that I sent to Kristina Stanger as Roy Leaf was out of the office on Leave of Absence at the time – with a question that is still unanswered.

I believe the answer to this question is Gaskill Signs, Inc. is still due payment from the date after the Bankruptcy filing of August 7, 2023, through August 31, 2023, for payment of leased billboard contract #3 under contract through October 31, 2023. The monthly lease amount of \$600 should be prorated from the day after Bankruptcy filing of August 7, 2023, through August 31, 2023, for leasing the billboard space during these days in August of 2023. The prorated amount due is \$464.52.* We did receive payment for the months of September and October of 2023. Paying for the days post bankruptcy through August 31, 2023, would be consistent with the bankruptcy process that was exercised for our payments received for the months of September and October, 2023.

I look forward to receiving our payment due of \$464.52 for billboard contract #3.



Thank you.

Kim Gaskill/11 Arbury Drive/Iowa City, Iowa/52246

GASKILL SIGNS, INC./kimberlygaskill@yahoo.com/319.354.5041

*\$600/31 = \$19.35 per day. Payment due for days post bankruptcy filing through August 31, 2023 equals 24 days x \$19.35 = \$464.52.

Kim Gaskill <kimberlygaskill@yahoo.com>

To: Kristina M. Stanger <kmstanger@nyemaster.com>

Cc: Roy Leaf <rleaf@nyemaster.com>

Hi, Kristina,

Gaskill Signs, Inc. had three billboard contracts with Mercy Hospital and only two are listed on the Rejected Contract List.

Copies of all three contracts were attached to the Claim form.

Also, the DTD is incorrect on one of the contracts listed on the Rejected Contract List.

Net/net:

- Contract #1 ran from August 1, 2022 through July 31, 2023.
- Contract #2 ran from August 1, 2022 through July 31, 2023.
- Contract #3 ran from November 1, 2022 through October 31, 2023.

Contract #1 and contract #2 were listed on the Rejected Contract List (note: the one with a DTD of August 1, 2021 should have read August 1, 2022)

-Given Contract #3 is not on the Rejected Contract List, what is the status of this contractual obligation/payment due? The monthly lease amount for this billboard was \$600. July, 2023 and August, 2023 payments are still outstanding in the total amount of \$1200. Gaskill Signs, Inc., did receive monthly payments of \$600 for the months of September and October, 2023.

Thank you for helping to clarify the situation.

Kim Gaskill

GASKILL SIGNS, INC.

11 Arbury Drive

Iowa City, Iowa 52246

Family Owned and Operated

I-80 Billboard Advertising since 1958

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA

IN RE:

MERCY HOSPITAL, IOWA CITY, IOWA,
et al.,

Debtors.

Chapter 11 Bankruptcy
Case No. 23-00623

OBJECTION TO ADMINISTRATIVE
CLAIM AND NOTICE OF OBJECTION
BAR DATE

COMES NOW Dan R. Childers, in his sole capacity as Trustee of the Mercy Hospital Liquidation Trust, by and through his counsel, and in support of this Objection respectfully states:

1. Gaskill Signs Inc filed Administrative Claim¹ #20041, in the amount of \$2,600.00 ("Claim").

2. The Trustee and his advisors have examined the Claim, and the Trustee objects to the Claim, for the following reason(s):

- ☐ a. The Claim either has been paid or the Trustee's advisor is still attempting to ascertain from the Debtors' records whether the Claim has been paid
- ☐ b. The Claim is not supported by the requisite documentation.
- ☐ c. No amount was stated on the Claim
- ☐ d. The Claim does not qualify as administrative status because the Claim, *inter alia*, was not incurred after the filing of Chapter 11, *or* did not benefit the Chapter 11 Bankruptcy Estate.
- ☐ e. The Claim was not timely filed
- ☐ f. The Claim was a duplicate of another Claim
- ☐ g. The Claim was amended by another Claim
- ☒ h. None of the provisions in 11 U.S.C. §503 applies
- ☐ i. The Claim was otherwise paid or assumed by Purchaser University of Iowa

¹ Pursuant to, *inter alia*, the Debtors' Motion re Administrative Claims (Dkt #694) and this Court's Order (Dkt #740), the Claim was filed with Epiq Corporate Restructuring LLC, and the Claim number was assigned by Epiq.

NOTICE IS HEREBY GIVEN that any **objection** from the claimant against the Trustee's Objection to the Claim must be filed with the Clerk of Court, U.S. Bankruptcy Court, Northern District of Iowa, 111 Seventh Ave. SE, Box 15, Cedar Rapids, IA 52401, so that the Objection is received by the Clerk of Bankruptcy Court in paper format or electronically **on or before December 5, 2024**. If no objection is timely and properly filed, an Order will be tendered by the Trustee to the Court, sustaining the Trustee's Objection. If a timely and proper objection is filed, a hearing on the Trustee's Objection and the claimant's Objection thereto will be set pursuant to further notice.

WHEREFORE, the Trustee respectfully prays this Court on such notice and hearing as it may direct, enter and enroll an Order disallowing the Claim, and for such other relief as may be just and proper under the premises.

/s/ E Lam
Eric W. Lam, AT0004416
Joseph Porter, AT0014454
SIMMONS PERRINE MOYER BERGMAN PLC
115 Third Street SE, Suite 1200
Cedar Rapids, IA 52401
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ATTORNEYS FOR LIQUIDATION TRUSTEE

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 5th day of November, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case. The undersigned also mailed, via United States Postal Service, postage fully paid, a copy of the foregoing document to

GASKILL SIGNS INC
11 ARBURY DR
IOWA CITY, IA 52246

/s/ Kelly Carmichael

MHLT/Pldgs/BA 23-00623 – Drafts/Obj to Administrative Claim and NOBD 20041.10302024.1809.ewl